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*Attorneys for Philippe Schaad
and Shooting Gallery Publications, LLC*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

LAWRENCE J. SEMENZA II; ROMIE
SEMENTA; LAWRENCE J. SEMENZA,
LTD; PHILIPPE SCHAAD; SHOOTING
GALLERY PUBLICATIONS, LLC; TESLA,
INC.,

Defendants.

Case No.: 2:22-cv-02059-APG-DJA

**STIPULATION AND ORDER TO
EXTEND SCHEDULING ORDER
DEADLINES (THIRD REQUEST)**

Pursuant to Local Rules IA 6-1, LR IA 6-2, and LR 26-1, Plaintiff the United States of America (“Plaintiff”), Defendants Lawrence J. Semenza II, Romie Semenza, Semenza LTD, Philippe Schaad, and Shooting Gallery Publications, LLC (“Defendants”) (collectively the “Parties”), by and through their respective undersigned counsel of record, hereby stipulate and agree:

1. On February 13, 2024, the Parties submitted, and the Court approved a second stipulation extending the scheduling deadlines. As set forth in the stipulation the Parties were meeting and conferring on two outstanding discovery issues, related to Plaintiff’s claims of deficiencies in Defendants’ responses to written discovery and a FRCP 30(b)(6) deposition of Plaintiff. Thus, to facilitate potential resolution of these outstanding discovery issues, the discovery deadline was extended to May 1, 2024, for the limited purpose of the outstanding

1 discovery issues, the dispositive motion deadline was extended to June 3, 2024, and the pre-trial
2 order deadline was extended to July 3, 2024. *See* ECF 30.

3 2. On March 21, 2024, Plaintiff filed a motion to compel regarding certain responses
4 to requests for production of documents and interrogatories and requested oral argument on the
5 motion. *See* ECF 31.

6 3. On March 22, 2024, the Court issued a minute order setting a hearing on Plaintiff's
7 motion to compel for May 16, 2024, at 10:00 am. *See* ECF No. 32.

8 4. On March 22, 2024, Defendants Philippe Schaad and Shooting Gallery
9 Publications, LLC served a Third Supplemental Disclosure of Documents and Witnesses.

10 5. The Parties continued to meet and confer on the outstanding discovery issues, and
11 on April 2, 2024, the Parties conducted another meet and confer to discuss Plaintiff's claims
12 surrounding deficiencies in responses to requests for production of documents and interrogatories
13 and the 30(b)(6) deposition of Plaintiff.

14 6. The Parties were able to agree on the issues surrounding a 30(b)(6) deposition of
15 Plaintiff but are still attempting to work through the issues regarding Plaintiff's claims of
16 deficiencies in responses to requests for production of documents and interrogatories. Thus, to
17 facilitate additional time for Defendants to respond to Plaintiff's motion to compel, the Parties
18 agreed to set a briefing schedule. Moreover, as part of this conference the Parties discussed the
19 currently scheduled hearing date of May 16, 2024, on Plaintiff's motion to compel, and it was
20 advised that counsel for Defendants Philippe Schaad and Shooting Gallery Publications, LLC
21 would be out-of-town and unavailable on this date. Further, since Plaintiff's counsel would have
22 to travel to Las Vegas for the 30(b)(6) deposition of Plaintiff, it was discussed that if the Court's
23 calendar permitted it would be most efficient to have the hearing set on either May 13, 2024, May
24 14, 2024, or May 15, 2024, and depending on the date the hearing is rescheduled the Parties could
25 schedule Plaintiff's 30(b)(6) deposition on one of these alternative dates.

26 7. For the above reasons, and for good cause shown, the Parties therefore seek the
27 current scheduling deadlines, as set forth in the Court's order granted in the second stipulation to
28

1 extend (ECF No. 30), be extended by approximately two months and modified as reflected in the
2 table below.

3 Deadline	Previous	Modified
4 Discovery Deadline	Wednesday, May 1, 2024 (limited to outstanding requests)	Monday, July 1, 2024 (limited to outstanding requests)
6 Dispositive Motion Deadline	Monday, June 3, 2024	Friday, August 2, 2024
7 Pretrial Order	Wednesday, July 3, 2024	Monday, September 2, 2024

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8. This stipulation is being entered into good faith and not for the purposes of delay.

DATED this 18th day of April, 2024.

DATED this 18th day of April, 2024.

MCMENEMY HOLMES PLLC

U.S. DEPT. OF JUSTICE, TAX DIVISION

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DATED this 18th day of April, 2024.

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*Attorneys for Lawrence J. Semenza II, Romie
Semenza and Lawrence J. Semenza, Ltd.*

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: 4/22/2024